

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

TITUS DEPEAL,

Case No. 1:25-cv-11275

Plaintiff,

v.

Hon. Thomas L. Ludington

HOLY CROSS CHILDREN'S
SERVICES, et al.,

Defendants.

**STIPULATION AND ORDER EXTENDING TIME FOR PLAINTIFF TO
RESPOND TO DEFENDANTS SAGINAW INTERMEDIATE SCHOOL
DISTRICT AND SAGINAW INTERMEDIATE SCHOOL DISTRICT
BOARD OF EDUCATION'S MOTION TO DISMISS PLAINTIFF'S
COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED by the undersigned counsel for Plaintiff and Defendants Saginaw Intermediate School District Saginaw Intermediate School District Board of Education that the deadline for the Plaintiff to file a response to Defendants Saginaw Intermediate School District Saginaw Intermediate School District Board of Education's Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(b)(6) (ECF No. 11) is extended from July 23, 2025, to Tuesday, September 2, 2025.

Plaintiff respectfully requests this additional time for the following reasons. Attorney Cornish's twin daughters passed away within the last month and he is

recently returning to work after an extended bereavement leave. Attorney Cornish is lead counsel in this matter. Attorney Abdnour agreed to serve as local counsel to assist Attorney Cornish in filing the Complaint before the statute of limitations ran while he awaited approval of his application for admission to this Court, but Attorney Abdnour has no specific knowledge of the case.

No Party will be prejudiced by extending the deadlines in this matter and Defendants Saginaw Intermediate School District Saginaw Intermediate School District Board of Education consent the proposed extension.

IT IS SO STIPULATED on July 23, 2025.

s/ Elizabeth K. Abdnour

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s/ Kailen C. Piper with permission

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*Attorneys for Defendants Saginaw
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Intermediate School District Board of
Education*

IT IS SO ORDERED.

Dated: July 29, 2025

s/Thomas L. Ludington
THOMAS L. LUDINGTON
United States District Judge